JDG:AMC F. #2011R02090

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

TRICT COURT RN DISTRICT RN DISTRICT RN YORK

UNITED STATES OF AMERICA

<u>INFORMATION</u>

-against-

Cr. No. <u>12-CR-363 (BMC) (RER)</u> (T. 21, U.S.C., §§ 331(c), 331(k) and 333(a)(2))

CLAUDIA MILLER, also known as "Claudia Bolanos,"

Defendant.

THE UNITED STATES ATTORNEY CHARGES:

In or about and between November 2011 and March 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CLAUDIA MILLER, also known as "Claudia Bolanos," knowingly and willfully, and with intent to defraud and mislead, did acts with respect to a device while the device was held for sale after shipment in interstate commerce that resulted in such device being adulterated and misbranded, to wit: MILLER placed silicone-based fluids sent from Colombia into syringes and injected clients seeking buttocks augmentation with those silicone-based fluids, which she knowingly misrepresented to clients to be safe, such acts resulting in the device being (a) adulterated under Title 21, United States Code, Section 351(f)(1) in that such device had

not been approved for cosmetic injection, or exempted from approval requirements, by the United States Food and Drug Administration, and (b) misbranded under Title 21, United States Code, Section 352(f) in that the labeling failed to bear adequate directions for use.

(Title 21, United States Code, Sections 331(c), 331(k) and 333(a)(2))

LORETTA E. LYNCH UNITED STATES ATTORNEY

EASTERN DISTRICT OF NEW YORK

ACTING UNITED STATES ATTORNEY PURSUANT TO 28 C.F.R. 0.136